

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

PLAINTIFFS' EXHIBIT 17

Deposition Transcript of Virginia Beach City Council Member Aaron Rouse



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Transcript of Aaron R. Rouse

Date: September 11, 2019

Case: Holloway, et al. -v- City of Virginia Beach, et al.

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

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LATASHA HOLLOWAY and :
GEORGIA ALLEN, :
Plaintiffs, : CASE NO.
v. : 2:18cv00069
CITY OF VIRGINIA BEACH, et al., :
Defendants. :

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Deposition of AARON R. ROUSE
Virginia Beach, Virginia
Wednesday, September 11, 2019
9:12 a.m.

Job No. 261325

Pages 1 - 127

Reported by: Penny C. Wile, RPR, RMR, CRR

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

2

1 Deposition of AARON R. ROUSE, held at the
2 offices of:

3
4
5 VIRGINIA BEACH CITY ATTORNEY
6 2401 Courthouse Drive
7 Municipal Center, Building One
8 Room 260
9 Virginia Beach, VA 23456
10 (757) 385-4351
11
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17 Pursuant to Notice, before Penny C. Wile,
18 RPR, RMR, CRR, Notary Public of the Commonwealth
19 of Virginia.
20
21
22

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

3

1

A P P E A R A N C E S

2

ON BEHALF OF THE PLAINTIFFS, LATASHA HOLLOWAY

3

AND GEORGIA ALLEN:

4

DANIELLE LANG, ESQUIRE

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ON BEHALF OF THE DEFENDANTS, CITY OF VIRGINIA

13

BEACH, ET AL.:

14

CHRISTOPHER S. BOYNTON, ESQUIRE

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Transcript of Aaron R. Rouse
Conducted on September 11, 2019

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P R O C E E D I N G S

Whereupon,

AARON R. ROUSE,

after having been first duly sworn, was examined
and did testify under oath as follows:

EXAMINATION BY COUNSEL FOR THE PLAINTIFFS:

BY MS. LANG:

Q. Good morning, Mr. Rouse. I'm going to do
a few, kind of, basic instructions for
depositions.

Have you ever been deposed before?

A. I have.

Q. So some of this might be familiar to you.

So we'll try to speak with verbal answers
and cues. It's easy in normal conversation to say
uh-huh or uh-uh or shake your head, but it's hard
for the court reporter to take that down, so I'll
ask you to say yes or no.

It's also important we don't speak over
each other. In normal conversation we often
finish each other's sentences, we know where
you're going with something. Again, it's hard for

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1 the court reporter to have a clean record. So I'm
2 going to do my very best to always let you answer
3 your questions. And I'll ask that you, kind of,
4 let me finish my questions.

5 If you don't understand any of my
6 questions, feel free to ask me to restate them.

7 A. Okay.

8 Q. If you don't ask me, I'll assume that you
9 understood the question. Is that all right?

10 A. Yes.

11 Q. Okay. From time to time your attorney may
12 object to some of my questions. Unless he
13 instructs you not to answer, that objection is
14 only for the record and you can go ahead and
15 answer the question. Okay?

16 A. Yes.

17 Q. All right.

18 MR. BOYNTON: And toward that end, there
19 was an email that was received yesterday evening
20 from Mr. Hebert, who is your colleague, that,
21 quite candidly, mischaracterized the deposition
22 that took place two days ago that we will

Transcript of Aaron R. Rouse
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1 ultimately have a transcript of. Nevertheless, in
2 light of his email, I want to first ask the
3 deponent if he wishes to assert legislative
4 privilege today to the extent it applies to any
5 specific questions that are asked?

6 THE DEPONENT: I do.

7 MR. BOYNTON: Thank you.

8 And you may proceed.

9 Q. We can take breaks whenever you'd like.
10 The only thing I ask is that if you -- if I've
11 asked a question, that you answer the question
12 first and then we can take a break.

13 Do you know of any reason why you can't
14 answer questions truthfully today?

15 A. No.

16 Q. You mentioned you've been deposed before.
17 How many times have you been deposed?

18 A. Once.

19 Q. Okay. And what -- and what case was that?

20 A. Traffic accident.

21 Q. Okay. And can you just state your full
22 name and position for the record?

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

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1 A. Aaron Roosevelt Rouse, City Councilman at
2 large.

3 Q. And are you originally from Virginia
4 Beach?

5 A. I am originally from Norfolk, but I moved
6 to Virginia Beach around fifth grade, so I would
7 say yes and no.

8 Q. Fair enough.

9 And how long have you been living in
10 Virginia Beach currently?

11 A. Twenty-some-plus years.

12 Q. Okay. And what district do you currently
13 live in within Virginia Beach?

14 A. That would be Princess Anne now.

15 Q. Okay. And how long have you lived in that
16 district?

17 A. Five months now.

18 Q. Okay. And where were you living before?

19 A. Bayside district.

20 Q. And can you tell me a little bit about
21 your educational background?

22 A. Graduate of First Colonial High School. A

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

9

1 graduate of Virginia Tech; Bachelor of Science
2 degree in Sociology.

3 Q. And after college, what did you do for a
4 living?

5 A. Professional football player, National
6 Football League.

7 Q. And how long were you playing for them?

8 A. Four years.

9 Q. Then what did you do after that?

10 A. Played Minor League for two years. And,
11 then, started my non-profit.

12 Q. What is your non-profit?

13 A. Rouse's House.

14 Q. What does Rouse's House do?

15 A. It is a non-profit that looks forth to
16 giving back to the community but based on
17 education.

18 Q. And so what, specifically, does Rouse's
19 House do with respect to education?

20 A. Every year we give away school supplies
21 not only to the youth but teachers, as well. And,
22 then, this year we're looking forward to actually

Transcript of Aaron R. Rouse
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1 helping kids out with college application fees.

2 Q. Does Rouse's House have any employees
3 other than you?

4 A. Yes. One assistant. She, basically, does
5 everything.

6 Q. And when did you found Rouse's House?

7 A. Got our non-profit designation in 2018.

8 Q. Okay. When did you stop playing for the
9 Minor Leagues?

10 A. 2012, I would say.

11 Q. Okay. And what were you doing for a
12 living between 2012 and 2018?

13 A. I was actually studying. Didn't actually
14 have a job per se, so I was studying.

15 Q. Okay. At an institution or self-study?

16 A. Actually, in the General Assembly.

17 Q. I'm sorry?

18 A. The state General Assembly.

19 Q. Okay. When did you first learn about the
20 lawsuit that brings us here today?

21 A. A couple months, probably, ago.

22 Earlier -- earlier this year, I think, it may have

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

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1 been.

2 Q. Okay. So you weren't aware of this
3 lawsuit prior to your election to City Council?

4 A. No.

5 Q. Okay. What did you do to prepare for this
6 deposition today? And I'll preface the whole
7 series of questions I'm going to ask you with
8 please don't tell me anything your attorneys told
9 you. You can tell me you met with them and who
10 was there, how long, but please don't tell me any
11 of the contents of the conversation.

12 So with all of that preface, what did you
13 do to prepare for this lawsuit?

14 A. Just met with my attorneys.

15 Q. And which attorneys?

16 A. Mr. Boynton and -- I forgot the --

17 MR. BOYNTON: Mr. Harris.

18 A. Mr. Harris. I'm sorry.

19 Q. That's okay.

20 And was anyone else present at that
21 meeting?

22 A. No.

Transcript of Aaron R. Rouse
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1 Q. And when did you meet with them?

2 A. A couple of days ago.

3 Q. For how long?

4 MR. BOYNTON: We've been objecting for how
5 long because I think that goes into the level and
6 content of preparation. So that's where we have
7 drawn a line in prior depositions, and we'll be
8 consistent with that.

9 MS. LANG: Are you going to instruct him?

10 MR. BOYNTON: I just did. Yes.

11 MS. LANG: For clarity of the record, I'd
12 like you, if you're instructing a client not to
13 answer, to instruct him not to answer.

14 MR. BOYNTON: Happy to.

15 We object to the witness answering to how
16 long he met with his attorneys to prepare as
17 invading attorney-client privilege, and,
18 accordingly, will instruct him not to answer.

19 MS. LANG: Thank you.

20 Q. Did you talk to anybody else about your
21 appearance at this deposition today?

22 A. No.

Transcript of Aaron R. Rouse
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1 Q. No?

2 Did you review any documents in
3 preparation for this deposition today?

4 A. I had no documents.

5 Q. Did you -- have you discussed this lawsuit
6 with other Council members?

7 A. Executive session.

8 Q. Okay. Outside of executive session, have
9 you discussed this lawsuit with any Council
10 members?

11 A. No.

12 Q. Okay. Have you discussed the lawsuit with
13 the Mayor?

14 A. No.

15 Q. With other city officials?

16 A. No.

17 Q. Do you know of any reason right now that
18 you couldn't be in Norfolk, Virginia during the
19 week of January 14th, 2020?

20 MR. BOYNTON: The question is are you
21 available for trial?

22 A. No. I don't know. I have nothing on the

Transcript of Aaron R. Rouse
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1 schedule.

2 Q. Okay. Thank you.

3 Are you aware that we've asked for some
4 documents, official documents, in this case?

5 A. Yes.

6 Q. Okay. And we're going to get to the
7 subpoena that I know that you received in a
8 moment, but for now I'm just speaking about our
9 request for official documents the Virginia
10 Beach -- that you have in your official capacity.

11 A. Uh-huh.

12 Q. Is that clear?

13 A. Yes.

14 Q. Did your -- were you involved at all in
15 the collection of documents to produce in this
16 case?

17 A. Clarify.

18 Q. Did you assist in identifying documents
19 that would be relevant to this case and should be
20 produced to the plaintiffs?

21 A. If I'm understanding your question
22 correctly, was I asked if I had documents to

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1 provide?

2 Q. Sure. Or did you help identify search
3 terms or any number of ways in which you may have
4 assisted?

5 A. Oh. No. No. I don't --

6 Q. No?

7 Were you asked if you had documents?

8 A. Yes.

9 Q. And did you collect documents yourself?

10 A. If I had documents.

11 Q. Okay.

12 MR. BOYNTON: Go ahead.

13 Q. When conducting business as a City Council
14 member, do you have an official email account?

15 A. Yes.

16 Q. And what is that?

17 A. arouse@vbgov.com.

18 Q. Do you ever use your personal email to
19 conduct Virginia Beach business?

20 A. No.

21 Q. Do any of your colleagues sometimes use
22 personal emails?

Transcript of Aaron R. Rouse
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1 A. I don't know.

2 Q. When you get emails at your vbgov --
3 vb.gov account, are they sometimes from Gmail
4 accounts or Yahoo accounts or other non-vbgov
5 accounts?

6 A. I don't ever pay attention to that. I
7 don't know. It just comes through as City
8 Council. And I just read the internal subject. I
9 don't look at the email accounts, where they come
10 from.

11 Q. Okay. Are you aware of any of your
12 colleagues using personal email?

13 A. No. I don't -- I just know about my own
14 email. I don't look at their accounts.

15 Q. And as far as documents you hold as a City
16 Council member, how do you store those documents?
17 Do you have an office laptop or how do you store
18 electronic documents for your city business?

19 A. They're stored on -- I have a city
20 cellphone, and they're stored -- everything is
21 forwarded, so everything that comes on my city
22 account is already stored, so I don't, you know...

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1 Q. If you need to find a document, for
2 example, how do you go about doing that?

3 A. I just go on my phone, just my email
4 account, and look at it. I guess that's what
5 you're asking me.

6 Q. I think so.

7 So is it the case that the only place that
8 you have any City Council documents is on your
9 email?

10 A. Yes.

11 Q. Okay. You don't -- do you have a laptop
12 computer?

13 A. I have an iPad, but, unfortunately, I
14 haven't synched my email account from that, from
15 our city email account.

16 Q. So are there any documents at all on your
17 iPad that might relate to your campaign or --

18 A. No. The only thing that would be on mine
19 is the email account, is my city email account.
20 That's the -- it's a city-issued iPad.

21 Q. Okay. Do you have a personal laptop?

22 A. Yes, I do.

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1 Q. Do you ever exchange text messages with
2 City Council members?

3 A. Very rarely, but cellphone.

4 Q. But you have exchanged text messages to
5 City Council members?

6 A. Very rarely, yes.

7 Q. Okay. Do you know who?

8 A. Not off -- not offhand. It would be -- I
9 don't want to speculate, but not offhand.

10 Q. Okay. Do you keep a calendar?

11 A. Yes.

12 Q. And where do you keep that calendar?

13 A. On the phone.

14 Q. Okay. Do you have any handwritten
15 notepads that you ever use?

16 A. During the meeting.

17 Q. And where do you keep those?

18 A. I don't keep the record.

19 Q. So where are those now?

20 A. Disposed of.

21 Q. They're in the trash?

22 A. Yes.

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1 Q. All of them?

2 A. I would imagine they're disposed of. I
3 mean, take notes throughout the meeting, and then
4 they would be disposed of. I didn't keep anything
5 per se.

6 Q. So do you leave them in the room when you
7 leave executive meetings?

8 A. Yes.

9 Q. Okay. Do you have an office?

10 A. No. I don't even -- no. I don't have an
11 office.

12 Q. The city doesn't provide offices to
13 Council members?

14 A. No. We have a shared room we can use.

15 Q. Among all the City Council members?

16 A. Yeah.

17 Q. Okay.

18 A. I wish I had an office.

19 Q. Do you have a social media -- any social
20 media accounts?

21 A. I do.

22 Q. What kinds of social media do you have?

Transcript of Aaron R. Rouse
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1 A. Instagram, Facebook, Twitter.

2 Q. If I wanted to find you on Twitter, how
3 would I do that? What's your handle, I think is
4 the proper term?

5 A. Aaron Rouse.

6 On Twitter?

7 Q. Yeah.

8 A. AaronRouseVB -- VaBch.

9 Q. Is that the same handle for Instagram?

10 A. AaronRouse. Aaron, underscore, Rouse.

11 Q. And are you on Facebook just as Aaron
12 Rouse, as well?

13 A. Yes.

14 Q. Okay. Do you use your Facebook or
15 Instagram or Twitter to talk about your position
16 as City Council member?

17 A. No, but I post -- I post pictures of -- I
18 post pictures throughout the community, but never
19 about business of the City Council.

20 Q. Okay. And that's for your Instagram?

21 A. That's for everything. Facebook, if I
22 post something -- I have a Councilman Aaron Rouse

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1 Facebook page that I consider my, you know -- if
2 I'm speaking as a Councilman, I'm updating the
3 public.

4 Q. So you do have, like, an official Facebook
5 account?

6 A. Yes. All those are personal.

7 Q. Okay.

8 A. So it's just Councilman Aaron Rouse is my
9 city -- it's not city-issued, but it's --

10 Q. I understand.

11 Do you have any official accounts on
12 Twitter, Instagram?

13 A. No.

14 Q. In addition to your work phone, do you
15 have a personal cellphone?

16 A. I do.

17 Q. I imagined the answer was yes.

18 A. Yes.

19 Q. And have you ever text messaged with any
20 city officials on your personal phone?

21 A. No.

22 Q. Do you use any cloud services to store

Transcript of Aaron R. Rouse
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1 documents, such as Box or Dropbox or Google Drive?

2 A. No. I'm not a Google Drive type person.

3 Q. Okay.

4 A. I've used Dropbox before, but I don't -- I
5 don't pay for any cloud services.

6 Q. If you need to keep a document for your
7 personal use, where do you keep it?

8 A. For personal use? I only keep what comes
9 in my packet.

10 Q. I'm sorry?

11 A. Our Friday packet. I only keep the --
12 what is it? The agenda.

13 MR. BOYNTON: The city provides Council --

14 MS. LANG: I don't need your testimony.

15 MR. BOYNTON: I'm trying to help you.

16 MS. LANG: That's okay. I don't need it.

17 A. I only receive the agenda package every
18 Friday. That's the only thing I keep.

19 Q. So say --

20 A. I don't keep --

21 Q. Say you have personal documents. Where do
22 you keep your personal documents, you know, in

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

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1 life? Sometimes we're given --

2 A. Oh. Personal documents?

3 Q. Yeah.

4 A. I would keep them in a file. I would just
5 keep it.

6 Q. Like, in a filing cabinet or --

7 A. Like, a safe box.

8 Q. Okay. And you mentioned the Friday
9 packet. Can you explain to me a little bit about
10 what that is?

11 A. So every Friday we receive a packet
12 letting us know the agenda for the upcoming
13 Tuesday.

14 Q. Okay. And who provides that to you?

15 A. It's sent out through the City Clerk and
16 city staff.

17 Q. In this case one of the things we do in
18 lawsuits is we exchange requests for documents and
19 we, also, exchange questions. We call them
20 interrogatories. Fancy name for questions. In
21 this case plaintiffs have served a number of
22 interrogatories on the City Council and all the

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1 City Council members. Have you reviewed those
2 interrogatories?

3 A. I have.

4 Q. Okay. And how did you assist in answering
5 them?

6 A. By answering them.

7 Q. Okay. So you wrote out answers to the
8 interrogatories?

9 A. What was applicable, if that's what you
10 mean.

11 Q. And how many of those were applicable,
12 that you recall?

13 A. I can't recall.

14 Q. One? More than one?

15 A. I don't recall. I mean, I would have to
16 see them. I don't recall.

17 Q. Do you remember if there were any in which
18 you actually provided answers directly?

19 A. Not offhand. Not offhand. I think my
20 biggest was I was searching for any documents for
21 the subpoena, which I didn't have any.

22 Q. Okay. But just focusing on the

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1 interrogatories for a minute --

2 A. I don't recall the questions.

3 Q. Right. But do you remember if you looked
4 at them and said, no, I don't have any answers or
5 did you look at them and were you able to provide
6 any answers whatsoever?

7 A. I don't recall the questions. I mean, I
8 answered what I knew, what I -- but I really -- I
9 would have to see them again.

10 Q. Okay. What did you do to look for
11 documents that would be responsive to the
12 subpoena?

13 A. Searched my government account. I
14 searched my other account, my personal account. I
15 searched through everything, documents. And I
16 didn't have anything.

17 Q. And how did you search?

18 A. Go through the account. You search
19 digitally.

20 Q. I guess what I mean is I imagine that you
21 did not review every email you've ever received in
22 your life; is that right?

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1 A. Yeah. But you -- you know, there is -- I
2 think we're all technologically -- understand how
3 to use it. Go to the account. You put in
4 keywords. You search all kinds of things.

5 Q. That's what I was trying to get at.

6 A. Okay.

7 Q. So what kind of keywords did you use?

8 A. I searched for voting system. I searched
9 for my campaign. I searched for questions that
10 related to the forum. I searched anything that
11 would pop up that could have something to do with
12 this case.

13 Q. Did you look at all of the questions in
14 the subpoena or did you just look for documents
15 related to the case generally?

16 A. Well, I've read through it, and I searched
17 for any documents that would have anything to do
18 with it.

19 Q. Okay. I'm going to introduce as Exhibit 1
20 the subpoena you received.

21 (Exhibit 1 was marked and
22 attached to the transcript.)

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1 Q. So is this document familiar to you?

2 A. Yes.

3 Q. Okay. And at the end you indicated you
4 don't have any responsive documents; is that
5 right?

6 A. Yes.

7 Q. Okay. If you could look at number 8 on
8 Exhibit 1. It says, "Provide any and all
9 documents, communications, and things related to
10 the lack of minority representation on Virginia
11 Beach City Council from January 1, 2000 to the
12 present."

13 Do you see that?

14 A. Yes.

15 Q. What do you recall -- like, how did you
16 search for responsive documents to that question?

17 A. Well, I don't know exactly how I did it,
18 but I -- nothing popped up for me for -- about
19 minority representation in any documents.

20 Q. You've commented on minority
21 representation?

22 A. I have.

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1 Q. Okay. So you didn't have anything that
2 indicated your comments about minority
3 representation in Virginia Beach?

4 A. No, I didn't. No.

5 Q. During your campaign did you have election
6 materials that you used to pass out to
7 constituents?

8 A. Yes.

9 Q. Okay. Where are those materials now?

10 A. Gone, thank God.

11 Q. They're not stored anywhere?

12 A. No.

13 Q. You couldn't find them if you needed to?

14 A. No. I don't -- all of them are gone.

15 Q. But the digital copies of those documents,
16 where do those live now?

17 A. I would imagine with my campaign -- my at
18 the time campaign manager.

19 Q. And who was your campaign manager?

20 A. Esmel Meeks.

21 Q. And did you ask -- is that a woman or a
22 man?

Transcript of Aaron R. Rouse
Conducted on September 11, 2019

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1 A. It's a man.

2 Q. Did you ask Mr. Meeks to look for
3 responsive documents to the subpoena?

4 A. No.

5 Q. Okay. But he has your campaign materials?

6 A. No. I didn't say he has my campaign
7 materials. You asked me if he would have them.

8 Q. Okay.

9 A. Everything was disposed of. The campaign
10 is over. All the material we had we passed out,
11 gave away everything. We wouldn't keep anything.

12 Q. But you mentioned that the digital copies
13 would likely be with Mr. Meeks; is that correct?

14 A. I don't know. I don't know. He may or
15 may not have it.

16 Q. But you didn't ask him?

17 A. No.

18 Q. Okay. So it's your testimony there isn't
19 a single campaign document on your personal email,
20 on your personal laptop, on your cloud services,
21 anywhere else?

22 A. Document, like a picture or Aaron Rouse

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1 for City Council?

2 Q. Yeah.

3 A. Yeah. Sure.

4 Q. Okay. Were you endorsed by the Hampton
5 Roads Chamber?

6 A. I was.

7 Q. Okay. And do you have any campaign
8 documents, pictures, flyers, et cetera that
9 include that endorsement?

10 A. Yes. I'm sure there is a picture.

11 Q. Okay. Did you -- did you look for those?

12 A. Yes. Well, I didn't -- I didn't
13 understand if a picture was a document.

14 Q. Fair enough.

15 So in the definitions, it's all electronic
16 stored information, objects, and/or materials. So
17 if we were asking for things including pictures,
18 would that maybe change your response to the
19 subpoena?

20 A. Yeah. I've got pictures.

21 Q. Okay. During your campaign did you
22 interact at all with the Virginia Beach

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1 Interdenominational Ministers Conference?

2 A. Not -- not the Conference per se, no.

3 Q. With members of the Conference?

4 A. Yes.

5 Q. Okay. What about with the NAACP chapter?

6 A. Members, not --

7 Q. Okay.

8 A. -- per se.

9 Q. Or the Virginia Beach African American
10 Leadership Forum?

11 A. Yes. I believe so.

12 Q. So would you have any materials at all,
13 including pictures, that might represent your
14 communication or appearance with members of those
15 groups?

16 A. Yes.

17 Q. Okay. During your campaign I imagine you
18 talked to a lot of different constituencies; is
19 that right?

20 A. Yes. Entire city.

21 Q. And did you make any effort specifically
22 to reach out to the minority communities in

Transcript of Aaron R. Rouse
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1 Virginia Beach?

2 A. Yes.

3 Q. Okay. And might you have some materials,
4 including pictures, documents, or otherwise,
5 showing your outreach to the minority communities
6 in Virginia Beach?

7 A. Yes, but it wouldn't be anything that
8 would stand out. I'm from a minority community.
9 I grew up here. So...

10 Q. I understand.

11 A. My whole Instagram account, you could look
12 at that.

13 Q. Fair enough. Thank you.

14 So you were elected in November 2018; is
15 that right?

16 A. Yes.

17 Q. And when were you sworn in?

18 A. January 8th, 2019.

19 Q. And your current position is as an
20 at-large City Council member; is that right?

21 A. Yes.

22 Q. When did you decide to run for office?

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1 A. 20 -- I announced earlier 2018.

2 Q. Do you remember the month?

3 A. Maybe March. I'm sorry. I don't recall.

4 Maybe March.

5 Q. That's okay. I'm just trying to get a
6 general idea. Your best memory is always going to
7 be okay with me.

8 A. Right.

9 Q. And how did you announce your candidacy?

10 A. Through -- what do you call it --
11 announcement event.

12 Q. You have a press event or something along
13 those lines?

14 A. I wouldn't call it a press event.

15 Q. Okay. Where was it?

16 A. The Westin.

17 Q. Okay. And who was there?

18 A. A lot of people were there.

19 Q. About how many people?

20 A. Eighty to -- about 80 to 100.

21 Q. Okay. What groups of people did you
22 invite to that event?

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1 A. All groups.

2 Q. How did you -- how did you send out those
3 invitations?

4 A. I think it was event -- social media
5 event. And it wasn't an invitation per se. It
6 was open.

7 Q. You announced it on social media?

8 A. Yes.

9 Q. Okay. How did you decide to run for
10 office?

11 A. How?

12 Q. I mean, what made you decide to run for
13 office?

14 A. I'm from here. I grew up here. And I
15 wanted to improve our city.

16 Q. Uh-huh.

17 And for how long were you thinking about
18 running for office before you announced in early
19 2018?

20 A. 2018 -- I didn't decide I was going to run
21 for office probably until 2015, I want to say,
22 2016.

Transcript of Aaron R. Rouse
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1 Q. Uh-huh.

2 So you were thinking about it or you were
3 sure you wanted to in 2015 or 2016?

4 A. I was thinking about it.

5 Q. And why did you decide on City Council
6 rather than some other position?

7 A. I decided on City Council, you know, after
8 I did my studying and work -- I didn't have an
9 official title, but working with people in the
10 General Assembly.

11 Q. Uh-huh.

12 A. I decided on City Council because I felt I
13 would be most needed, I got the most impact.

14 Q. During the time period you were thinking
15 about running for office, who did you talk to
16 about that possibility?

17 A. Everyone that will listen.

18 Q. Fair enough.

19 A. Everyone.

20 Q. Were there any, kind of, city officials
21 that you were able to speak to about the
22 possibility of running?

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1 A. No.

2 Q. No?

3 A. No. I didn't speak to any -- no one from
4 the city.

5 Q. Did you speak to members of the Ministers
6 Conference?

7 A. No.

8 Q. Okay. So what are some examples of people
9 that you asked for counsel as you were considering
10 whether or not to run for office?

11 A. Personal mentors and people whose opinions
12 I really respect at the state level.

13 Q. And who are some of those people?

14 A. It's just general.

15 Q. But could you provide me with some
16 examples of mentors of yours?

17 A. I'm trying to, you know -- I'll say
18 certain delegates, just on the thought of running
19 and what their experience is. Like, it could,
20 literally, be the entire General Assembly.

21 Q. Right.

22 Could you provide examples of people you

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1 had, maybe, longer conversations with?

2 A. Terry Austin. That's probably the one I
3 had the longest conversation with.

4 Q. Okay. Who else would you consider to be a
5 personal mentor for you?

6 A. My mom.

7 Q. Anyone else?

8 A. No.

9 Q. At any time did anybody ever approach you
10 and say, I think you should maybe run for office?

11 A. No. But once I -- no. But once the
12 announcement was made, you know, I got a lot of
13 support.

14 Q. That's great.

15 How did you go about hiring your campaign
16 manager?

17 A. Experience, recommendations.

18 Q. Did you have a job posting or was it more
19 informal?

20 A. More informal.

21 Q. Okay. So who recommended him?

22 A. I can't -- I don't know entirely who

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1 recommended him. I know his name just kept
2 popping up throughout informal meetings and things
3 like that.

4 Q. And when did you first meet with him?

5 A. I don't recall.

6 Q. 2017? 2018? 2016?

7 A. Probably early 2018.

8 Q. Was he the first person you hired for your
9 campaign?

10 A. Yes.

11 Q. Okay. Did you have any other staff for
12 your campaign?

13 A. Yeah.

14 Q. Okay. How large was your staff?

15 A. We had a media guy and, obviously, like an
16 assistant, so three, four.

17 Q. Who was the media person?

18 A. Lucas Anderson.

19 Q. And who was the assistant?

20 A. Chanel Blackwell -- Blackman.

21 Q. Okay. Did you -- once you announced your
22 candidacy, you mentioned you got a lot of support?

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1 A. Uh-huh.

2 Q. Who on the City Council did you receive
3 support from?

4 A. I would say none. None. When I
5 announced, you know, no one reached out to me from
6 Council.

7 Q. Okay. At any point during your campaign
8 did someone from Council reach out to you?

9 A. The later part, I think I may have had a
10 conversation with Jessica about a possible
11 endorsement, but I don't think she did endorse me.
12 I can't remember.

13 Q. Anyone else?

14 A. Yes. John Moss.

15 Q. And when was that?

16 A. Late in the campaign, probably a month
17 out.

18 Q. And did he endorse you?

19 A. Not that I'm aware of.

20 Q. And anyone else?

21 A. No.

22 Q. Okay. Did any other city officials,

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1 outside of Council members, reach out to you at
2 any point?

3 A. No.

4 Q. Okay. So the only city officials you
5 spoke to during the campaign were Jessica Abbott
6 and John Moss?

7 A. Uh-huh.

8 MR. BOYNTON: Just respond verbally, yes
9 or no.

10 A. Yes. I'm sorry.

11 Q. Thank you.

12 So did Ms. Abbott reach out to you or you
13 reached out to her?

14 A. Reached out to me.

15 Q. Mr. Moss, did you reach out to him or did
16 he reach out to you?

17 A. Actually, reached out to my campaign
18 manager. I wouldn't say it was him directly.

19 Q. Fair enough.

20 His campaign --

21 A. Yeah.

22 Q. -- or his people reached out to your

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1 campaign manager?

2 A. Yes.

3 Q. Thank you.

4 And Ms. Abbott, did she reach out to you
5 by email, phone?

6 A. Phone call.

7 Q. Okay. And when, about, was that?

8 A. It was late in the campaign year where
9 endorsements were coming in.

10 Q. Who were you endorsed by, that you can
11 remember?

12 A. Fire Department, Police Department, the
13 Chamber, the Black Caucus I want to say.

14 Q. Black Caucus did you say?

15 A. I believe so.

16 Senator Warner. Governor Ralph Northam.
17 I'm sure I'm missing some.

18 Q. Fair enough.

19 How did your endorsement by the Chamber of
20 Commerce come about?

21 A. You interview. You have an interview
22 process.

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1 Q. And who was that with? Who did you
2 interview with?

3 A. The Chamber board.

4 Q. Do you remember when, abouts, that was?

5 A. I do not.

6 Q. And what kind of questions did they ask
7 you?

8 A. Questions on the economy. That was
9 primarily the focus, I would say.

10 Q. And did you have to fill out any kind of
11 survey or was it just an in-person interview?

12 A. It was an in-person interview. In-person
13 interview.

14 Q. Okay. No survey?

15 A. Not that I recall.

16 Q. And how about your endorsements by the
17 Fire and the Police Departments, how did that come
18 about?

19 A. Meetings.

20 Q. Uh-huh.

21 Who did you meet with?

22 A. The president at the time.

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1 Q. The president of the Fire Department?

2 A. Uh-huh.

3 Q. And, then, did you also meet with the
4 president of the Police Department?

5 A. Yes, but I believe it's the Police FOP. I
6 don't believe it's the actual Police Department.
7 I think it's their -- their union or their
8 representative group, so to speak.

9 Q. I understand that.

10 So it was the union that supported you?

11 A. Yes, if that's their union. I don't -- I
12 don't know how you would classify that.

13 Q. Fair enough.

14 But it was their -- the Fire and
15 Policemen's representative group?

16 A. Yes.

17 Q. Okay. Are those two separate groups?

18 A. They are separate.

19 Q. Okay. And how did you -- how did your
20 endorsement by Senator Warner come about?

21 A. That's a good question. I don't know,
22 quite frankly, but I was happy to have it. I was

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1 happy to have it.

2 Q. How did you find out about it?

3 A. My campaign manager.

4 Q. And how did he find out about it, if you
5 know?

6 A. I do not know.

7 Q. Did somebody from Senator Warner's office
8 reach out?

9 A. I'm sure they did, but I do not know. I
10 know I'm thankful for my campaign manager, I'll
11 tell you that much.

12 Q. Did you ever meet with Senator Warner?

13 A. I've met him once -- well, yeah, once or
14 twice prior.

15 Q. And when was that?

16 A. I spoke at a Democratic breakfast meeting,
17 I want to say.

18 Q. When was that? 2018? 2017?

19 A. 2018. I'm sorry.

20 Q. Fair enough.

21 And, then, was there a second time that
22 you met with him, that you can recall?

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1 A. No.

2 Q. Is it unusual for City Council members to
3 get endorsements from statewide officeholders?

4 A. Very unusual.

5 Q. And you were also endorsed by Governor
6 Northam?

7 A. Yes.

8 Q. How did that come about?

9 A. I would say by Bruce Smith.

10 Q. Okay. Who is Bruce Smith?

11 A. Bruce Smith is a good friend I've known
12 since college.

13 Q. And professionally?

14 A. Professionally, Hall of Fame football
15 player, NFL football player.

16 Q. And Mr. Smith has been a pretty outspoken
17 critic of some issues in Virginia Beach, political
18 issues in Virginia Beach; is that right?

19 A. Yes.

20 Q. How did Mr. Bruce have a connection to
21 Governor Northam?

22 A. He's a businessman, I guess. I don't know

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1 that.

2 Q. So did he introduce you to Governor
3 Northam directly?

4 A. Yes.

5 Q. Okay. When did you meet with Governor
6 Northam?

7 A. '18.

8 Q. Did you meet him up in Richmond or did he
9 come out here?

10 A. I believe it was a function. He held some
11 function here. And as all candidates do, shake
12 the Governor's hand and hopefully get an
13 endorsement. For me, it was a far stretch, but we
14 did get it.

15 Q. That's great.

16 Do you know what might have led him to
17 give you an endorsement?

18 A. I think my reputation, my acumen of being
19 a community leader, the changes I spoke about, my
20 platform.

21 Q. Uh-huh.

22 Did you ask any other City Council members

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1 for endorsements?

2 A. No.

3 Q. Who else did you reach out to for
4 endorsements?

5 A. That was pretty much it.

6 Q. Okay.

7 A. Whoever wanted to endorse me, we were
8 welcome to have it.

9 Q. Fair enough.

10 So this might be a little bit more within
11 your ordinary wheelhouse.

12 Can you tell me a little bit about what
13 your platform was when you were running?

14 A. So public safety was my huge platform, as
15 well as a level playing field economically was
16 one. Having more diverse Council, I spoke about
17 that numerous times. Public safety and -- and
18 transportation.

19 Q. I'm going to ask you to elaborate on some
20 of those things.

21 A. Okay.

22 Q. So what, specifically, were you hoping to

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1 do around the issue of public safety?

2 A. I wanted our police officers and our first
3 responders and our teachers to be paid a fair wage
4 and to have more importance or -- have more value
5 throughout our community, so I wanted to help them
6 get the tools and things they needed.

7 Q. Did you ever talk about diversity in
8 the -- for the police force and teachers, as well?

9 A. No. Not particularly, no.

10 Q. Okay.

11 A. But it was -- it did come up, I mean,
12 question, but I never...

13 Q. And what kind of policies did you support
14 to support a level playing field economically?

15 A. Debundling contracts, have more of
16 minority participation in city contracts,
17 increasing -- I mean, it would be the same thing.
18 Increasing minority participation throughout the
19 city.

20 Q. Uh-huh.

21 What do you mean by debundling contracts?

22 A. Making sure that we have -- you're going

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1 to issue a huge contract, that you have basic
2 set-asides for minority participation, so kind of
3 debundling that, minorities can participate in
4 specific areas of a contract.

5 Q. Diversity of the Council is pretty
6 self-explanatory, so I'll move on to what kind of
7 policies or initiatives were you supporting around
8 the issue of transportation?

9 A. Light rail. Whether it be the financing
10 of light rail that got everyone up in a bunch, I
11 still wanted to have a suitable transportation
12 plan in place. It didn't necessarily have to be
13 light rail. But I still think a regional
14 transportation plan should be implemented and put
15 in place. So I wanted to improve that.

16 I wanted to improve the roads. Obviously,
17 bussing schedules, that as well. I wanted to be
18 more open to new and advanced technologies as far
19 as, you know, Uber and Lyft, things like that.

20 Q. And, finally, what kind of policies were
21 you supporting to further affordable housing?

22 A. To me, it's -- I could go on all day about

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1 this, but a livable wage, affordable housing
2 throughout the City of Virginia Beach where we
3 need to invest more in that. I know we have a lot
4 of single family homes which -- you know, look at
5 the trends, that most people aren't moving towards
6 because of the affordability of wage. So I wanted
7 to look at that, as well. But that was on par
8 with increasing jobs.

9 Q. As far as a livable wage, does that mean
10 you support an increase in the minimum wage?

11 A. I do.

12 Q. Okay. To what?

13 Fair enough.

14 A. You know, you don't have to decide that.
15 But, obviously, not what it is today.

16 Q. Okay. Between March 2018 and November
17 2018 you were campaigning for City Council, right?

18 A. Yes.

19 Q. How many hours a week did that take up in
20 your life?

21 A. Is 40 hours a full work week?

22 Q. Yes.

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1 A. Then I would say double, triple that.

2 Q. Fair enough.

3 So it was more than a full-time job?

4 A. Yes. Way more, on a shoestring budget.

5 Q. What took up your time day-to-day while
6 you were campaigning?

7 A. Everything. We didn't -- we really were
8 doing it ourselves, grassroots type of campaign,
9 you know. I don't want to say I put up myself,
10 but my campaign manager and I would put up all our
11 own signs, go try to be at every forum, every City
12 Council meeting, shaking as many hands as we can.

13 Q. Did you do a lot of door-knocking?

14 A. We did. But we found that wasn't the best
15 strategy for small --

16 Q. Okay.

17 A. -- small staff.

18 Q. Was that strategy particularly difficult
19 because you have to span all of Virginia Beach?

20 A. Yes.

21 Q. I imagine that you had fundraisers; is
22 that right?

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1 A. Yes.

2 Q. How many fundraisers would you say that
3 you had?

4 A. Three.

5 Q. And where were they?

6 A. Various places. Personal homes.
7 Obviously, my announcement we were fundraising.
8 That was one.

9 Q. So the Westin was one of them?

10 A. Yes.

11 Q. Who hosted a fundraiser at their personal
12 home?

13 A. I believe Mike Standing, Sr.

14 Q. Mike Stanley?

15 A. Standing, Sr.

16 Q. And who is he?

17 A. A local resident staying here forever.

18 Q. What neighborhood in Virginia Beach did
19 you grow up when you moved here in fifth grade?

20 A. Friendship Village. Seatack.

21 Q. Seatack.

22 We talked about putting up signs and going

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1 to City Council meetings and some door-knocking
2 and fundraisers. What other activities were you
3 up to during your campaign?

4 A. Everything. I mean, to me, campaigning
5 wasn't as different as what I did in my normal
6 life. It just was more of the same, you know. I
7 always ran with local groups. I always spoke at
8 the schools. I've always been a speaker because
9 of my professional background. So I've always
10 been asked to come and, you know, speak, whether
11 it's to the Sports Hall of Fame or different -- it
12 wasn't anything different; it was just more of it.
13 And now that I was running for office, it was more
14 demand.

15 Q. Yeah. That makes sense to me.

16 Did your campaign do anything specifically
17 to reach out to the Asian community in Virginia
18 Beach?

19 A. Yes. We ran an open, clean campaign. One
20 of the things I feel as though in politics -- I
21 wanted to -- politics is so polarized today. We
22 wanted to run a common ground campaign for

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1 everyone to partake in. So everything -- we did
2 it all. We didn't exclude anyone. We included
3 everyone. We met with anyone who wanted to meet
4 with us. We outreached. We -- there was no rock
5 left unturned.

6 Q. I understand. I've worked on a couple
7 campaigns before, so I know that story.

8 Are there any Asian community groups in
9 particular that you recall meeting with?

10 A. No. I want -- do you consider Filipinos
11 Asians?

12 Q. Sure.

13 Did you work with Filipino groups in
14 particular?

15 A. Yes.

16 Q. With what groups?

17 A. FILAD -- CAB. CAB.

18 Q. What does that stand for?

19 A. Filipinos Advancement Group. It's pretty
20 long.

21 Q. Fair enough. I can probably figure it out
22 from there.

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1 A. Yeah.

2 Q. Any other groups?

3 A. As far as Asian groups?

4 Q. Yeah.

5 A. No.

6 Q. Do you recall meeting with any Asian
7 community leaders?

8 A. Not anyone in particular that stands out.

9 Q. Any Hispanic or Latino groups you recall
10 meeting with?

11 A. I met with -- I met with so many people,
12 it's hard for me to say I remember meeting with
13 this person, this person, because, again, I think
14 the difference in my campaign is I already had a
15 visible face because of my professional career, so
16 I met with tons of people everywhere.

17 Q. I entirely understand that.

18 Like I said, just give me your best
19 recollection.

20 A. I don't have anyone in particular from the
21 Hispanic group.

22 Q. How did you decide to run for this

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1 particular at-large opening rather than a
2 district-based seat?

3 A. That's a good question. I wanted to
4 represent the entire city. I wanted to represent
5 everyone's interest. I really felt as though we
6 needed to balance -- a good balance to our city.
7 So that's why I decided to run at large. I didn't
8 want to be confined to one area.

9 Q. But the district-based City Council
10 members, they are elected at large, as well,
11 right?

12 A. They are. They have a focus. They have a
13 seat to represent their particular district. Me,
14 I want to represent our entire city.

15 Q. And you've moved in between districts?

16 A. I have.

17 Q. Were there incumbents in both the Princess
18 Anne and Bayside districts at the time you ran in
19 2018?

20 A. Yes. Yeah.

21 MR. BOYNTON: Are you asking were they on
22 the ballot for that election or people in the

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1 seats? I think you need to clarify your question,
2 please.

3 MS. LANG: Thank you.

4 Q. Was the incumbent running in Princess
5 Anne?

6 A. Yes.

7 Q. And was the incumbent running in Bayside?

8 A. Yes.

9 Q. Were two incumbents running for the
10 at-large seats?

11 A. One was open, and -- one and one. Yes.

12 Q. So there were incumbents running for both
13 seats?

14 A. There was -- there is two at-large seats.
15 There was one incumbent, and one was vacated.

16 Q. Okay.

17 A. So one was open, and was one incumbent.

18 Q. So only one incumbent was running for the
19 two at-large seats; is that right?

20 A. Yes. Yes.

21 Q. Okay. We already touched on this a little
22 bit. But what challenges do candidates face

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1 running an at-large campaign in Virginia Beach?

2 A. Time, money, and the issues because we
3 have a very unique and diverse community, so...

4 Q. Uh-huh.

5 And Virginia Beach is a pretty big city;
6 is that right?

7 A. Yes.

8 Q. It's the largest --

9 A. Populated city in the State of Virginia.

10 Q. Yes.

11 Is the media market expensive to run ads
12 across all of Virginia Beach?

13 A. Yes.

14 Q. Did you run ads on television?

15 A. The last week, yes. Yes. We were very
16 social media driven.

17 Q. Okay. So you had social media ads?

18 A. Uh-huh.

19 Q. But you did run some TV ads?

20 A. Yes. Not some. One.

21 Q. One?

22 A. Yes.

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1 Q. Okay.

2 A. Yes.

3 Q. And was that towards the end of your
4 campaign?

5 A. Yes.

6 Q. Okay. Did you do billboards?

7 A. No.

8 Q. No?

9 A. Can't afford that.

10 Q. Any other forms of paid advertising?

11 A. Radio.

12 Q. Okay. Anything else?

13 A. No.

14 Q. All right. So door-knocking was not
15 particularly effective, in part because Virginia
16 Beach is so big; is that right?

17 A. I wouldn't -- yes, but, also, I think it
18 determines how many volunteers you can actually
19 get out to knock the doors.

20 Q. Uh-huh. Yeah.

21 I think I understand your general
22 testimony to be it's very expensive to run an

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1 at-large election in Virginia Beach?

2 A. Yes.

3 Q. And do you think that that expense
4 probably makes it so that some people can't
5 effectively run a campaign in Virginia Beach that
6 might otherwise?

7 MR. BOYNTON: I want to object to the form
8 of the question. It calls for speculation. The
9 witness can answer as he is able to.

10 A. Can you repeat the question?

11 Q. My question is given it is very expensive
12 to run a campaign in Virginia Beach, does that
13 mean that not everyone will be able to run a
14 campaign in Virginia Beach?

15 A. No. It doesn't mean that. Politics, in
16 general, is expensive.

17 Q. Uh-huh.

18 But the more expensive it is, the less
19 large -- would you agree that the more expensive a
20 campaign is, the smaller pool of people that will
21 feel equipped to run a campaign?

22 MR. BOYNTON: Again, I'm going to object

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1 because I think it calls for speculation.

2 MS. LANG: The objection is fine.

3 MR. BOYNTON: But thank you.

4 A. It could -- yeah. I don't know how to
5 answer that, so I don't --

6 Q. Okay. You mentioned that because of your
7 past career as a football player you had some
8 significant name recognition in Virginia Beach
9 already; is that right?

10 A. Yes, but not because of my past. I've
11 always been in the community, so I like to
12 attribute that.

13 Q. Fair enough.

14 But you did testify earlier that the
15 combination of you being in the community --

16 A. Yes. And --

17 Q. -- and being a football player, people
18 asked you to come speak places?

19 A. Yes.

20 Q. And so among people in Virginia Beach that
21 have been there their whole lives, you have more
22 name recognition than many?

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1 A. Yes.

2 Q. Okay. And do you think that helped you
3 kick-start your campaign, that name recognition in
4 the community?

5 A. Yes.

6 Q. And none of this is to undermine the hard
7 work of your campaign?

8 A. No.

9 Q. I just mean to, kind of, understand the --
10 the atmosphere that you were going into your
11 campaign with.

12 A. Yeah.

13 Q. You came in with, you know, some
14 confidence that the community already knew you --

15 A. Yes.

16 Q. -- and who you were?

17 A. I came in with that confidence because
18 since I was going to high school here, school
19 here, I've always been -- I was, like, a community
20 leader. I've always given back. So when you add
21 that with a professional career, particularly
22 where you come from, you run for office, I think

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1 it's like a -- probably added to this. Fair
2 enough? A lot of support.

3 Q. Yeah.

4 And do you think that recognition as a
5 community leader and a well-known community leader
6 because of your professional career helped you
7 fundraise, as well?

8 A. No. I think what helped me fundraise was
9 the -- was my political acumen. I think people,
10 when they came out, they were like we want to see
11 Aaron Rouse. But when you start talking about the
12 issues, your policies, people then start believing
13 in Aaron Rouse. So my football career just got
14 them in the door.

15 Q. Fair enough. That makes sense.

16 But it did get them in the door; is that
17 right?

18 A. Yeah.

19 Q. Given your prior testimony, I think I know
20 the answer to this, but during your 2018 campaign
21 did you ever campaign with any other candidates
22 that were going to be on the ballot in November?

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1 A. No.

2 Q. Did you support a slate of candidates for
3 the 2018 election?

4 A. No.

5 Q. Do you know if any other candidates
6 included you on their slate of candidates?

7 A. No.

8 Q. I'm going to mark Exhibit 2.

9 (Exhibit 2 was marked and
10 attached to the transcript.)

11 Q. So this is a subpoena response from
12 Councilman Wood. He's a current Council member;
13 is that right?

14 A. Yes.

15 Q. So I ask you to turn to what says
16 Attachment A. It's in about the middle of the
17 packet.

18 The page before that.

19 MR. BOYNTON: A is there (indicating).

20 Q. So Attachment A reads this is a
21 "screenshot of a text message where a candidate
22 reported to me that poll workers for another

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1 candidate were handing out different color
2 handouts depending upon the race of the person
3 they encountered at the polling place."

4 And the following page is some pictures of
5 text messages. Do you see that?

6 A. Yes.

7 Q. These are not particularly legible. But
8 my understanding is that there was testimony from
9 Council Member Wood about these text messages, and
10 he indicated that what was told to him was that
11 handouts were being given out on the basis of
12 voters' race and your name was included on the
13 handout that was given to African American voters
14 but not to white voters.

15 Have you heard about this?

16 A. I have on the day of the election.

17 Q. Okay. Who reported it to you on the day
18 of the election?

19 A. Workers. Poll workers.

20 Q. Your volunteers or actual poll -- or the
21 official poll workers?

22 A. Actual volunteers or -- and people who

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1 were just...

2 Q. Uh-huh.

3 Did they report it to you directly?

4 A. No.

5 Q. To your campaign?

6 A. Yes.

7 Q. And at what polling location was this? Do
8 you remember?

9 A. I do not. I do not.

10 Q. And what Council member staff was handing
11 out these different handouts?

12 A. I don't -- I don't know who it was handing
13 them out. I know when I heard of it I was like,
14 what are you going to do? What can you do about
15 it? You know, I kind of dismissed all the
16 negative things I heard throughout the campaign.
17 What can you do?

18 Q. Fair enough. I imagine that's all you can
19 do.

20 But is it discouraging to think there are
21 some candidates that are targeting voters based on
22 their race?

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1 A. Yeah.

2 Q. Okay. What do you think the strategy was
3 of including your name on one slate of candidates
4 for African American voters but not on the slate
5 for white voters?

6 MR. BOYNTON: I'm going to object that it
7 calls for speculation.

8 But you can answer.

9 A. To boost -- I guess to get the black vote,
10 I would think.

11 Q. That's my assumption, as well.

12 Okay. To this day you're not aware which
13 Council member was handing these out?

14 A. No.

15 Q. Did your campaign respond in any way to
16 this activity?

17 A. No.

18 MS. LANG: You want to take a break?

19 MR. BOYNTON: Take a five-minute break.

20 (A recess was taken.)

21 Q. Prior to the 2018 campaign, did you know
22 Sabrina Wooten at all?

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1 A. No.

2 Q. Okay. Did you get to know her during the
3 campaign at all?

4 A. No.

5 Q. Okay. When was the first time you met
6 Ms. Wooten?

7 A. On the campaign trail.

8 Q. Okay.

9 A. One of the forums somewhere.

10 Q. Do you know what City Council members, if
11 any, supported Ms. Wooten in her campaign?

12 A. I do not.

13 Q. Do you know if any Hispanic or Latino
14 candidates have ever been elected to Virginia
15 Beach City Council?

16 A. No. I do know of --

17 Q. Ron Villanueva?

18 A. Ron Villanueva, yes.

19 Q. Okay. And he's Filipino; is that correct?

20 A. Yes.

21 Q. Do you know of any other Asian --

22 A. No.

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1 Q. -- or Hispanic or Latino City Council
2 members?

3 A. No.

4 Q. So just Ron Villanueva?

5 A. Uh-huh.

6 Q. Okay.

7 A. Yes. Sorry.

8 Q. Fair enough.

9 How long have you been registered to vote?

10 A. As long as I could have, I believe.

11 Q. Since you were 18?

12 A. Yes.

13 Q. Okay. And you vote regularly?

14 A. Yes.

15 Q. Have you always voted regularly?

16 A. Yes.

17 Q. Have you always voted in Virginia Beach or
18 did you vote -- did you move your residency
19 elsewhere when you were playing football
20 professionally or did you always keep your
21 residency here?

22 A. My residency is in Virginia Beach.

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1 Q. I think you've touched on this a little
2 bit in your prior testimony. But were you
3 politically active prior to your 2018 candidacy?

4 A. Yes.

5 Q. How so?

6 A. Learning legislative process, learning the
7 issues, the process how to implement bills, bring
8 them to the floor, what committees do, commissions
9 do.

10 Q. You mentioned you were kind of working
11 informally with the General Assembly in order to
12 gain those skills; is that right?

13 A. Yes.

14 Q. Were there specific delegates you were
15 working with?

16 A. No. I -- no. I met -- it was so
17 informal. I didn't have a title or anything. It
18 was just, Hey, teach me what you know. And what
19 do you do here? What do you do here? What is
20 this? It's open to the public. I was always up
21 there just trying to learn.

22 Q. Okay. Fair enough.

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1 So this was kind of a self --

2 A. Yes.

3 Q. -- created program for yourself?

4 A. Yes. It was self-improvement. I was -- I
5 was intrigued about the legislative process.

6 Q. Okay. So you didn't have any kind of
7 official volunteer position?

8 A. I didn't have any official voluntary
9 position.

10 Q. And had you ever run for public office
11 before this campaign in 2018?

12 A. No.

13 Q. And have you ever been appointed to any
14 public position before --

15 A. No.

16 Q. -- your 2018 campaign?

17 A. No.

18 Q. Prior to 2018, had you ever worked on any
19 political campaigns for other candidates?

20 A. No.

21 Q. All right. Had you ever endorsed anyone
22 for City Council?

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1 A. No.

2 Q. Or supported a City Council candidate with
3 donations?

4 A. No.

5 Q. Did you ever volunteer for any candidates?

6 A. No.

7 Q. Okay. Any other way in which you may have
8 been politically active in supporting a candidate,
9 other than voting?

10 A. No.

11 Q. Just voting?

12 A. Just voting.

13 Q. Did you talk about politics on your social
14 media ever?

15 A. I'm sure I commented here and there.

16 Q. Okay. Did you ever do any work to support
17 a presidential campaign?

18 A. No. Not officially, no.

19 Q. Okay.

20 A. Obviously, everyone has their choice who
21 they're going to vote for, but, no, nothing
22 official.

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1 Q. Okay. Have you ever given money in any
2 political campaign?

3 A. Yes.

4 Q. Which ones?

5 A. State Delegate Jay Jones is the only
6 candidate. I think I gave, maybe, 50 bucks.

7 Q. And when was that?

8 A. The year he ran. His first year when he
9 ran.

10 Q. Okay.

11 A. I think it was 2017, I think.

12 Q. No other races you've donated to?

13 A. No. I may have given 20 bucks to
14 President Obama.

15 Q. Okay.

16 A. Or \$10, whatever the tax records say.

17 MR. BOYNTON: I need it now, the records.

18 Q. There is a few special elections in
19 Virginia Beach this year, right?

20 A. I believe there is only -- there is no top
21 of the ticket. I believe there is just, I think
22 Senator -- Senate. Senate.

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1 Q. And some Virginia Beach special elections?

2 A. Yes. Yes. Virginia Beach special
3 elections.

4 Q. And are you currently supporting any
5 candidates for those special elections?

6 A. I am not.

7 Q. Okay. So you haven't endorsed anyone for
8 those races?

9 A. No.

10 Q. Do you plan to?

11 A. No. I stay out of political races. I
12 haven't endorsed anyone.

13 Q. Okay. When will you be up for reelection?

14 A. Four-year term. This is 2019. So 2022.

15 Q. It's a few years away, but do you have any
16 plans to run for reelection?

17 A. It really depends. If -- if it holds
18 that, yes. If God has me do other things, then
19 I'll do that.

20 Q. Are you fundraising currently for your
21 campaign?

22 A. No.

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1 Q. Okay.

2 A. But I probably should start.

3 Q. You've been in Virginia Beach a long time.

4 Over the course of your life the minority
5 population in Virginia Beach has grown; is that
6 right?

7 A. I don't know if it's -- I can't answer
8 that. I don't know if it's grown, but...

9 Q. Okay. Fair enough.

10 Do you know approximately the percentage
11 of the minority population in Virginia Beach now?

12 A. Yes.

13 Q. What is it?

14 A. Nineteen percent, I think. Nineteen
15 percent.

16 Q. Nineteen percent African American?

17 A. Yes.

18 Q. Okay. Do you know the approximate
19 percentages for Latinos and Asian Americans?

20 A. No.

21 Q. Okay. As a native Virginia Beacher, what
22 neighborhoods are the kind of historically black

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1 neighborhoods in Virginia Beach?

2 A. Seatack. I'd say Lake Edwards. There
3 is -- still the one I -- I can't think of the one
4 off Diamond Springs.

5 Q. Burton Station?

6 A. Burton Station. I'm even learning some.
7 Queen City. I don't know what particularly Queen
8 City is, but I've been learning a lot of that.

9 Q. Are there any neighborhoods that you would
10 consider to be predominantly Latino or Asian
11 neighborhoods?

12 A. I don't -- we don't necessarily say
13 neighborhoods. We would say areas, like Salem
14 area.

15 Q. And Salem area is predominantly Asian or
16 Latino or both?

17 A. From our own interpretation or -- some
18 would say Salem area usually has the highest
19 percentage of Hispanic and Filipinos.

20 Q. This is all in generalizations?

21 A. Yes.

22 Q. Which I know is uncomfortable for me and

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1 for everyone else, I think.

2 A. Correct.

3 Q. That's kind of how the law around these
4 issues works is to think about communities as a
5 group even though we know that they are --

6 A. Right.

7 Q. -- actually made up of lots of different
8 people with different racial makeups --

9 A. Right.

10 Q. -- and identities. I'm only speaking that
11 way because it's, also, how the world works.

12 I imagine the answer to this is no. But
13 were you involved in any way in the redistricting
14 in Virginia Beach after the 2010 census? That
15 would have been around 2011.

16 A. No.

17 Q. Do you know who Kimball Brace is?

18 A. No.

19 Q. Just saved yourself a whole page of
20 questions.

21 MR. BOYNTON: Zipping along.

22 Q. You talked about the importance of having

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1 increased diversity on the City Council as part of
2 your platform and part of your priorities for the
3 city. Can you explain for me in your own words
4 why it's important to increase the diversity of
5 the City Council?

6 A. I think it's important to increase the
7 diversity on the Council to allow different
8 perspectives to have a voice, whether that is
9 ethnicity or that's your sexual preference or your
10 business acumen. The more diverse we can be, the
11 stronger community, I feel, as though we can
12 build.

13 Q. And historically, not talking about right
14 now but historically, the Virginia Beach City
15 Council has struggled to have proportionate
16 minority representation; is that right?

17 A. Yes.

18 Q. Have you seen that as a frustration for
19 the minority community that you're from in
20 Virginia Beach?

21 A. Yes.

22 Q. Why do you think it is that historically

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1 Virginia Beach City Council has had few, if any,
2 African Americans be Council members?

3 MR. BOYNTON: I'm going to object to the
4 form as it calls for speculation.

5 You can answer the question.

6 A. Repeat the question.

7 Q. What reasons do you think there might be
8 that historically Virginia Beach has struggled to
9 have African American representation on City
10 Council?

11 A. I think it would be a number of issues.
12 Economics is one. Suitable candidates, one. The
13 voting, as far as minorities probably haven't seen
14 anyone do it before, so it's just having that
15 boldness to step up and run. And, then, the
16 issues.

17 Q. What do you mean by the issues?

18 A. I mean, by issue, is what may particularly
19 have been an issue for minority population may be
20 overlooked by the majority.

21 Q. And so those issues might not resonate
22 with the rest of the white voters in Virginia

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1 Beach?

2 A. With the rest of the city, yeah.

3 Q. Going forward, what obstacles do you see
4 to maintaining minority representation on the City
5 Council and increasing it?

6 A. I think getting more people involved, I
7 think, would be an obstacle. And I mean that
8 across the board, not just Virginia Beach. But
9 having more -- engaging more youth and getting
10 involved in the civic process, that may be an
11 obstacle.

12 But that's really a tough question for me
13 to answer.

14 Q. Fair enough.

15 Are you aware that voting in Virginia
16 Beach is, unfortunately, still pretty racially
17 polarized?

18 MR. BOYNTON: Object to the form of the
19 question. I think it assumes --

20 MS. LANG: That's okay. Your objection is
21 as stated.

22 Q. Are you aware that there continues to be

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1 racially polarized voting in Virginia Beach?

2 A. Yes.

3 Q. Putting aside the lawsuit that brings us
4 here today, are you aware of any proposals to
5 change the Virginia Beach electoral scheme to a
6 single member district system?

7 A. Say that again.

8 Q. Outside of this lawsuit, are you aware of
9 any proposals to change the Virginia Beach
10 electoral scheme to a single member district
11 system, meaning that there would be 10 districts
12 or 11 districts and each -- and voters in each
13 district would elect a candidate for that
14 district?

15 A. We've spoke about it.

16 Q. When have you spoken about it?

17 MR. BOYNTON: I am going to at this point
18 interject an objection to the extent it gets into
19 conversations about legislative discussions
20 dealing with -- between Council members as to the
21 establishment of policy, that that would be within
22 legislative privilege.

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1 Beyond that, if you have other pieces of
2 information you can give, you can answer.

3 A. That's about it.

4 MS. LANG: Okay. And are you instructing
5 him not to answer even with respect to when
6 conversations have happened?

7 MR. BOYNTON: He can answer, certainly,
8 when because it would only apply as to his time on
9 Council. So anything before on Council, certainly
10 he can answer the question.

11 Q. When have you had conversations about
12 potentially changing to a single member district
13 system?

14 A. After my election on Council.

15 Q. Uh-huh.

16 And when, specifically, during your time
17 on Council?

18 A. I don't know specifically when. I don't
19 have a date, but it would be right after the
20 election on Council, obviously, having the first
21 two African Americans elected on Council in
22 Virginia Beach, so it was a topic of discussion.

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1 Q. Did you have a City Council retreat this
2 year?

3 A. We did.

4 Q. When was that?

5 A. February, I believe.

6 Q. And was that issue on the agenda for the
7 retreat?

8 A. I do not -- I'm not sure. I do not
9 recall.

10 Q. Okay. Has the issue ever been discussed
11 in open session since you've been City Council
12 member, available to the public?

13 A. Yes. On the dais, yes.

14 Q. On what?

15 A. On -- yes. In chambers.

16 Q. When?

17 A. I can't -- I don't remember, but I'm sure
18 it's public record.

19 Q. Fair enough.

20 So there was a City Council meeting in
21 which it was discussed since you've been on the
22 Council; is that right?

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1 A. Yes. In the public --

2 Q. Public?

3 A. Yes.

4 Q. And during that public session, who spoke
5 in support of a potential change?

6 A. Jessica Abbott.

7 Q. Who else?

8 A. I remember her specifically being in
9 support of it.

10 Q. What about Council Member Moss?

11 A. Yes. But I only say yes because I think
12 he spoke -- Council Member Moss speaks in a way
13 you have to discern what he is saying. So in my
14 opinion, yes. Someone else may take it as he's
15 not -- he may even say he's not in support of it,
16 but he recognizes it may be somewhat of an
17 importance to him. I'm not speaking for him. I'm
18 just saying the way Council Member Moss words
19 things sometimes, you have to listen very closely.

20 Q. Do you support a change to a single member
21 district?

22 A. If that's what the people want.

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1 Q. And what do you mean by that?

2 A. If the people recognize that this may
3 be -- the system we have is currently not working
4 to serve the entirety of our city, yes, I believe
5 the people should have that.

6 Q. And so how would the people make that
7 determination rather than the City Council
8 members?

9 A. Just put it in a referendum. Put it on
10 the ballot.

11 Q. So you support putting it on the ballot?

12 A. Yes.

13 Q. Okay. Has that been a topic of
14 conversation with City Council members?

15 MR. BOYNTON: Same objection as to
16 individual non-public conversation among Council
17 members.

18 Beyond that, you can answer.

19 A. It was a topic of discussion.

20 Q. Do you know who supports that?

21 A. No. I mean, other than who spoke out in
22 the public section, other than that, everything

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1 else I'll consider executive.

2 Q. And what's the current status of the
3 proposal to put it on the ballot as a referendum?

4 A. I'm not sure we've taken it up anymore
5 since.

6 Q. And there was no vote at that time?

7 A. It was never a vote. It was just a
8 discussion.

9 Q. It was just a discussion?

10 And it hasn't been discussed since?

11 A. Not that I'm aware of.

12 Q. Okay. Are you aware that in the past
13 minority communities in Virginia Beach have
14 advocated for single member districts?

15 A. I'm aware of minority communities want
16 representation, you know. That's what I'm aware
17 of.

18 Q. Uh-huh.

19 And that one way that they have sought
20 representation is by a change in the electoral
21 system; is that right?

22 A. I only became aware of that after I was

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1 elected.

2 Q. Okay. But you're now aware that minority
3 communities have asked for single member districts
4 or a change in the electoral scheme?

5 A. I'm not aware minority communities were
6 saying that. I'm aware of minority communities
7 want more representatives. But as far as how we
8 get there, I haven't necessarily heard directly
9 from the community per se to say, hey.

10 Q. Okay.

11 A. Not saying they don't want it. I'm just
12 saying I haven't spoken to...

13 Q. That makes sense to me.

14 Was there anyone during public session who
15 spoke out against changing the electoral system?

16 A. There was. I believe a now deceased
17 George Minns. I believe, possibly, Andrew Jackson
18 spoke.

19 Q. Against changing the system?

20 A. Oh. Against changing the system?

21 Q. Yes.

22 A. I'm sorry. My bad.

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1 Q. That's okay.

2 A. So you can erase those two. I thought you
3 meant that was for.

4 Q. Who spoke against a single member district
5 system, including Council members?

6 A. I believe Council members -- it's hard to
7 say. I think everyone voiced their -- no one
8 voted. We never voted.

9 Q. Right.

10 A. Everyone voiced their concerns about
11 changing the current system. So I would surmise,
12 you know --

13 Q. Who voiced concerns about a change?

14 A. Everyone had concerns. I would say --
15 surmise that those that were probably against it
16 was Louis Jones, Barbara Henley, Rosemary.

17 Q. Okay.

18 A. But no one -- they didn't actually say
19 they were actually against it. It was just
20 concerns about changing it. So I just want to
21 make sure that's very clear.

22 Q. Fair enough.

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1 And what kind of concerns did they have?

2 A. Just if we changed the system, what system
3 would we go to? Are we sure this is the best
4 system to go to? And this is a matter of public
5 record, so...

6 Q. Fair enough.

7 A. Yeah.

8 Q. So you recall at this public hearing
9 George Minns testified in support of a change?

10 A. If I can recall correctly, yes.

11 Q. And I know that Mr. Minns has now passed
12 away. Was Mr. Minns considered a prominent leader
13 in the minority community?

14 A. Yes.

15 Q. You mentioned maybe Andrew Jackson spoke,
16 as well?

17 A. Yes.

18 Q. Is Mr. Jackson also a prominent community
19 leader or --

20 A. He would like to think he is, you know.
21 With all due respect, he would like to think he
22 is. But he's an out-spoken -- out-spoken person

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1 of the community.

2 Q. Okay.

3 A. He doesn't speak for the entire community.
4 I don't think no one did, other than George,
5 Mr. Minns, yes.

6 Q. Do you know what a numbered post system
7 is?

8 A. No.

9 Q. I didn't either.

10 So Virginia Beach has a numbered post
11 system in that it's this hybrid system, right?

12 A. Uh-huh --

13 Q. Right. Where there are -- putting aside
14 your two positions that are at large, there are
15 districts where there are individual races for
16 each of those districts but, then, they are
17 elected at-large.

18 A. Uh-huh.

19 Q. And that is a relatively unusual system to
20 have, kind of, these specific races rather than
21 having everyone run at large --

22 A. Right.

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1 Q. -- for an at-large election as you did?

2 A. Uh-huh.

3 Q. Do you see any downsides to having that
4 kind of individual districting system if the
5 elections are going to continue to be at large?

6 A. So you're asking me do I support the way
7 the voting system is now? Is that what you're
8 asking? Can you clarify that?

9 Q. I mean, I would be interested in your
10 answer to that question. I think my question is a
11 little more specific, which is can you see any --
12 do you know of or do you think there are any
13 downsides to having a system in which everybody
14 votes at large --

15 A. Okay.

16 Q. -- but there are individual races by
17 district?

18 A. Yes.

19 Q. And what are those?

20 A. The fact that someone else in a far part
21 of the city can vote for representatives for
22 someone on the opposite side. To me, I think

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1 that's an issue. I don't base it on race. I base
2 it on the specific issues that are confined to
3 that district --

4 Q. Uh-huh.

5 A. -- that I consider an issue. We have an
6 agricultural part of our community. And someone
7 who lives in a more urban side or community gets
8 to vote on who represents someone in that more
9 agricultural side of our city, to me that's a
10 problem.

11 Q. Right. Uh-huh.

12 A. So I say this is -- the issue is confined
13 to those specific districts.

14 Q. Uh-huh. Right.

15 And there is a particular complication, I
16 think -- you could have a system where there are
17 10 at-large members and they are all elected at
18 large, right?

19 A. Yeah.

20 Q. And if you had such a system, communities
21 that want to elect candidates could funnel all of
22 their support to the candidates they feel

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1 represent them the most; is that right?

2 MR. BOYNTON: I want to object as it calls
3 for speculation.

4 You can answer.

5 A. I'm not -- I'm not understanding your
6 question.

7 Q. Fair enough.

8 What I'm trying to get at -- and I'll try
9 to rephrase the question. Does it make it hard
10 for, kind of, constituencies, minority or
11 otherwise, to kind of band together if they have
12 to vote in each individual -- vote in individual
13 races of districts rather than all at-large
14 elections?

15 A. Does it make it hard for constituents to
16 vote -- I'm confused.

17 Q. I understand. It's a bit of -- political
18 science is the problem.

19 A. Technically, everyone is at large already.

20 Q. Right. But they have to vote -- so when
21 you ran for office --

22 A. Uh-huh.

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1 Q. -- there were two positions, and everybody
2 got to run for both of those positions, right?

3 A. Right.

4 Q. Whereas, in -- for the districts --

5 A. You have to live in the district.

6 Q. And it's just one position for each of
7 those districts, right?

8 A. Uh-huh.

9 Q. There is a concept called bullet voting.
10 Are you familiar with that?

11 A. Yes.

12 Q. So you can't do that when you have these
13 numbered posts; is that right?

14 A. Okay. I think I understand what you mean.

15 Q. Yeah.

16 So you can't engage in bullet voting when
17 you have all these numbered posts; is that right?

18 Let's move on. It's political science.

19 We don't need to do that to you. I apologize.

20 As you noted before, Ms. Abbott is a
21 supporter of a change to single member districts?

22 A. Uh-huh.

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1 Q. And she has written the following:
2 "Incumbents would find themselves to be less
3 insulated from the competition of challengers
4 because it is easier and less costly to run a
5 grassroots campaign in a district consisting of
6 roughly 30,000 neighbors rather than to 300,000
7 voters in the largest city of Virginia."

8 Would you agree with that statement?

9 A. Yes.

10 Q. What do you understand to be the goal of
11 this lawsuit?

12 A. To implement district voting.

13 Q. And for what purpose?

14 A. For the advantage of having an equal
15 voting system for minorities.

16 Q. And do you support that goal?

17 A. I support a goal of having everyone
18 participate. Whatever the people decide, that's
19 what I support.

20 Q. Under the current system, the requirement
21 is that you reside in a district. But you could
22 actually lose your own district, but -- elsewhere

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1 in the city and still get elected under the
2 current system; is that right?

3 A. No. You have to -- you have to live in a
4 district in which you run for unless you run at
5 large.

6 Q. Right. My question was unclear.

7 So you have to live in the district?

8 A. Right.

9 Q. But you could lose the popular vote in
10 your district but still win at large and still win
11 that district seat; is that right?

12 A. That's two different things. At large is
13 different from --

14 Q. No.

15 A. I'm sorry if I'm not following you.

16 Q. That's okay.

17 The district elections are still --
18 everyone gets to vote for them, right?

19 A. Right.

20 Q. So I could live in the district where I'm
21 running --

22 A. Right.

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1 Q. -- but my district doesn't like me much --

2 A. Right.

3 Q. -- and doesn't vote for me --

4 A. Right.

5 Q. -- but the city does like me, and so I win
6 the popular vote of the whole city --

7 A. Yes.

8 Q. -- and I would still win, right?

9 A. Yes.

10 Q. So I could win a district seat even
11 without the support of my own district?

12 A. Yes.

13 Q. Okay. Have you ever talked to anyone
14 about changing the current electoral scheme not to
15 single member districts but to another form of
16 voting, like ranked choice voting or cumulative
17 voting?

18 A. No.

19 Q. Are you familiar with those systems?

20 A. No.

21 Q. In addition to endorsing you for City
22 Council, Governor Northam has spoken a bit about

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1 concerns with the politics in Virginia Beach; is
2 that right?

3 A. Yes.

4 Q. And what has he spoken about?

5 A. The level playing field, so to speak, the
6 cronyism.

7 Q. And do you agree that there have been
8 problems with cronyism in Virginia Beach?

9 A. Yes.

10 Q. And what does that look -- how so?

11 A. It has minority participation in doing
12 business with the city, also the perception of --
13 or not enough representatives on City Council.

14 Q. Uh-huh.

15 So just to make sure I am clear, your
16 testimony is that you think that the cronyism,
17 what Governor Northam called the good ol' boy
18 system, led to a lack of minority representation
19 in city contracts?

20 A. Yes.

21 Q. Okay. And perhaps that good ol' boy
22 system led to lack of representation on City

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1 Council? Is that your testimony?

2 A. My testimony, it could possibly have an
3 effect on it, indirect effect on it.

4 Q. Fair enough.

5 There was a disparity study conducted in
6 Virginia Beach recently; is that right?

7 A. Yes.

8 Q. Are you aware of how long the minority
9 community was asking for a disparity study before
10 it was conducted?

11 A. I'm not aware how long. I know they've
12 been asking for one for a while.

13 Q. Uh-huh.

14 Do you know what finally led the City
15 Council to agree to conduct one?

16 A. Public outreach, marching.

17 Q. There was a march to support?

18 A. Yes. I don't know if protest -- but
19 public engagement.

20 Q. And what were the basic findings of that
21 disparity study?

22 A. That there was substantial

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1 underutilization of minority businesses at the
2 beach.

3 Q. Uh-huh.

4 And did the study find any reasons for
5 that?

6 A. The way contracts were structured, the
7 goal percentage. I think it had a lot to do
8 with -- I'm having a blank -- the way the
9 contracts were issued, the way they were
10 structured, and the actual advertisement, as well.
11 And what's the word I'm looking for? I can't
12 think of the word I'm looking for, but the actual
13 participation to get minorities to participate in.

14 Q. Okay. Outreach?

15 A. Outreach. Thank you.

16 Q. No problem.

17 Does the City Council have any role in
18 determining how contracts are structured or
19 issued?

20 A. Yes. City Council has a role in the way
21 contracts are -- Economic Development actually
22 decides those contracts, but City Council has a

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1 way of outreach and debundling the contracts and
2 setting goals to reach and maintain minority
3 participation.

4 Q. Okay. What has the reaction on City
5 Council been to the issuing of the 2018 Disparity
6 Study?

7 A. It's been well-received. I would say we
8 have empirical data that you can no longer -- you
9 can't overlook it.

10 Q. I'm going to mark Exhibit 3.

11 (Exhibit 3 was marked and
12 attached to the transcript.)

13 MR. BOYNTON: Is there any portion of it
14 you wish him to review or focus his review on?

15 MS. LANG: I'm getting there.

16 Q. So I've included just the executive
17 summary here since the report is much longer. And
18 I'd like to turn to pages 11 and 12 through -- 11
19 through 14 which focuses on program
20 implementation.

21 So the first recommendation that I see
22 here is the overall annual aspirational goal for

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1 minority-owned business participation should be
2 adjusted; is that right? It's on the top of page
3 12. It says, "The city should consider adjusting
4 its overall aspirational goal based on that
5 information and information about local
6 marketplace conditions presented in Chapter 3."

7 A. Okay. Second sentence.

8 Yes.

9 Q. Has the City Council adjusted its overall
10 aspirational goal for minority-owned business
11 participation?

12 A. Yes, we have.

13 Q. And what is it now?

14 A. It's 12 percent. Minority participation,
15 myself along with Councilman Wooten drafted an
16 ordinance to get that goal erased.

17 Q. And when did that happen?

18 A. Earlier this year. I don't know the exact
19 date.

20 Q. Summer? Spring?

21 A. Spring.

22 Q. Okay. It also -- the next section

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1 suggests that the city create a dedicated office
2 for the SWaM program.

3 Has the City Council done that?

4 A. No, we haven't.

5 Q. Has there been any movement towards doing
6 that?

7 A. No, but I also think there is always --
8 this is a goal. But they all have to have a plan
9 to get to that goal. So I'm the liaison for the
10 Minority Business Council. So once we define what
11 that is, I think the next step will actually
12 happen in office.

13 Q. Okay. Can you tell me a little bit about
14 your work as a liaison for the Minority Business
15 Council?

16 A. To always find a way to strengthen
17 minority participation within our city. What is
18 the outlook? What is the goal? How do we
19 increase it? What has the disparity shown us in
20 areas we can improve minority participation in our
21 city?

22 And so as the liaison, my job is to take

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1 those concerns and those issues and bring them
2 back to Council to implement them.

3 Q. Uh-huh.

4 So you mentioned that you're working with
5 the Council to -- or with the Minority Business
6 Group to come up with a plan for implementation of
7 this study; is that right?

8 A. Based off the recommendations of the
9 disparity study.

10 Q. And where are you in that planning
11 process?

12 A. Oh. We have some great ideas. We are --
13 have an event coming up this fall where we are
14 making minority businesses at the forefront
15 instead of an afterthought.

16 Q. Uh-huh.

17 Has City Council taken any other actions
18 related to these recommendations, other than the
19 adjustment of the aspirational goal?

20 A. I think -- well, we actually promoted a
21 city worker to head the Economic Development
22 Department who understands that is a goal for our

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1 city. He's doing a great job.

2 Q. Who is that person?

3 A. Taylor Adams. He's been doing a great job
4 of helping us get to that goal.

5 Q. And when was he appointed?

6 A. That's a good question. I don't make that
7 decision.

8 Q. Who makes that decision?

9 A. Our City Manager makes that. But we
10 currently don't have one, so...

11 Q. So who decided to appoint Taylor Adams?

12 A. He answers to the City Manager, so that
13 would be --

14 Q. Was it Dave Hansen who would have
15 appointed him?

16 A. Dave or one of the Deputy City Managers.
17 I don't --

18 Q. Okay. Do you know of any other City
19 Council actions that have been done to implement
20 this program, other than the changing of the
21 aspirational goal?

22 A. No.

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1 Q. Okay. Are there any actions that you
2 proposed related to the disparity study that
3 haven't been acted on yet?

4 A. Not yet. Not as of yet, no.

5 Q. Okay. How long have you been the liaison
6 to the Minority Business Council?

7 A. Since March. Since March.

8 Q. Who was the prior liaison to the Minority
9 Business Council?

10 A. I believe it was Shannon Kane, I want to
11 say.

12 Q. Okay. Who else is on the Minority
13 Business Council?

14 A. As far as?

15 Q. Who are you liaising with?

16 A. Louis Jones. Councilman Louis Jones. You
17 mean like that?

18 Q. No, although that's helpful.

19 I think this question is so basic that you
20 think I'm asking something more.

21 A. Okay.

22 Q. What is the Minority Business Council, and

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1 who is on that?

2 A. Okay. The Minority Business Council, it's
3 a makeup of minority business owners throughout
4 our city who come together to have a focus on how
5 do we, basically, improve minorities'
6 participation through our city. So that's who's
7 on that business -- minority business owners are
8 on there, as well as staff from the Economic
9 Development is there.

10 Q. Okay.

11 A. And, of course, because it's a city -- a
12 city -- what's the word I'm looking for? Not an
13 approved committee but approved committee. Then,
14 obviously, you've got an attorney that comes to
15 it, as well, so...

16 Q. And are the -- who are, kind of, the
17 leaders on the Minority Business Council from the
18 business community?

19 A. There is president Sheila Johnson. There
20 is -- there are so many members on there.

21 Q. Fair enough.

22 Is Bruce Smith on it?

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1 A. No.

2 Q. Any other officeholders other than the
3 president?

4 A. I see all their faces right now. I'm
5 drawing a blank. They're going to kill me. Yeah.
6 There is Olga -- Olga. I don't remember her last
7 name. I should.

8 Q. Okay. They probably won't read the
9 deposition transcript.

10 A. Yeah. It's a very diverse makeup.

11 Q. Fair enough.

12 What's your understanding of your job
13 responsibilities as City Council member?

14 A. To improve our city, to grow our city, to
15 balance all the perspectives of our city, and to
16 listen to the people. That's how I think our
17 first duty and loyalty is to -- is to the people.

18 Q. And what kind of more day-to-day
19 functions?

20 A. Help spur economic development, help
21 protect our community as far as listening to
22 issues, find ways to expand tax revenue for our

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1 city, to improve, actually, the communication from
2 government to the public, outreach.

3 Day-to-day is trying to find solutions to
4 all the things you can imagine, and to be -- to
5 be -- to be -- what's the word I'm looking for?
6 To be seen, so to speak, to always be, for me
7 personally, a Councilman that's easily accessible.

8 Q. Yeah.

9 And the City Council passes the budget for
10 the city; is that right?

11 A. Yes.

12 Q. And you can draft ordinances --

13 A. Yes.

14 Q. -- to pass laws; is that right?

15 A. Yes.

16 Q. What other kind of daily business do you
17 conduct at City Council meetings? What types of
18 things do you vote on and approve?

19 A. We vote on everything from, obviously,
20 ordinances, resolutions, to planning items, to
21 minority participation goals, to policing, to
22 everything that encompasses the city.

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1 Q. So it's a very broad role; is that right?

2 A. Yes. And as an at-large member it's a
3 very demanding role.

4 Q. I'm sure.

5 A. Yes.

6 Q. How regularly do you have public City
7 Council meetings?

8 A. Every Tuesday. Every other Tuesday is a
9 formal, and in between is their workshop.

10 Q. How often do you have an executive
11 session?

12 A. Every other Tuesday.

13 Q. Okay.

14 A. Yeah. So twice a month.

15 Q. What are the primary ways in which you try
16 to be seen and communicate and interact with your
17 constituents?

18 A. I go meet them where they are. I don't --
19 I don't wait until they come to Council and voice
20 their concern. I go to their public events. I go
21 to their City Council meetings. I'm already,
22 like, just, you know -- I'm just in their

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1 community already. Answer the emails, although I
2 get inundated with tons of emails. Listen to
3 their concerns. I hold town halls. I try to make
4 myself accessible and seen as much as possible. I
5 run with them. Like, I'm there. I'm there. This
6 is -- I'd like to note, though, they say it's a
7 part-time job, but it is full-time. Yes.

8 Q. Fair enough.

9 So are you paid as though it's a part-time
10 job? Is that the idea?

11 A. I am.

12 Q. What's the salary for City Council?

13 A. 28. 28. Yes, but it is a full-time. And
14 I enjoy it, though. I don't do it for the money.
15 I want people -- I know no one is going to read
16 it, but people say, oh, it's part-time. No. It's
17 full-time.

18 Q. You don't have any other job that -- well,
19 you have Rouse's House?

20 A. Right.

21 Q. We talked a lot about your platform and
22 your priorities more broadly. Are there kind of

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1 specific proposals or issues that you're trying to
2 move forward right now in the City Council?

3 A. Well, as liaison to the MBC, that's
4 something to me that's very important to increase
5 that, to increase our regional aspect of our
6 economy. Affordable housing is definitely
7 important to me, and transportation. So those are
8 all issues. But as you can imagine, this year has
9 been unlike any other year ever.

10 I was liaison for the Something in the
11 Water Festival. I was the only liaison for that.
12 And that took a lot of -- a lot of work to really
13 pull that through. And if it wasn't for staff
14 and -- city staff and employees and everyone to
15 help make that such a success -- I can't wait to
16 see the economic impact it has, but I know that's
17 going to be great. So that's one thing.

18 And, then, having -- obviously, dealing
19 with the tragedy we had on May 31st, that's been,
20 you know -- so me, I take my role on Council very
21 seriously, bringing our city together even in this
22 hyperpolarized type of political atmosphere. I

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1 don't -- we have some politics in my position, but
2 I don't consider myself as that. I consider
3 myself as just a member of this community who
4 lives -- who grew up here, who loves it, and who
5 has a vision to make our community as healthy and
6 as strong as possible. So I try to balance all
7 the perspectives and be my own person. I don't --
8 I stand on my own two feet, so to speak.

9 Q. How did you end up as the only liaison to
10 the Something in the Water Festival?

11 A. I was appointed to it. It was very --
12 festival approach, a very diverse festival which
13 talks about the strength of Virginia Beach from
14 every aspect of the arts, farming, to athletes, to
15 the youth, all those aspects.

16 And it was going to happen in the Beach
17 district, so there was a Beach district liaison,
18 as well, but because of the, you know, recount and
19 different things they were removed from that, and
20 we never replaced another. So the task fell in my
21 lap, and -- yeah.

22 Q. Do you know if the NAACP conducted any

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1 voter registration at the Something in the Water
2 Festival?

3 A. Not -- not specifically the NAACP.

4 Q. Okay. Do you know if anyone was
5 conducting voter registration at the Something in
6 the Water concert?

7 A. I know we had plans to conduct one, but
8 the building was going to be -- the building
9 wasn't going to be ready to have actual voter
10 registration, so I'm not sure if they still did it
11 or not.

12 Q. What building are you referring to?

13 A. There was -- obviously, within the
14 footprint of the festival there was going to be a
15 specific location, just like we had for Tim
16 Minchin and other -- and there was going to be a
17 specific location for voter registration that was
18 going to be led on by certain artists. And
19 because the building, the way they were going to
20 structure the building, the footprint of getting
21 people safely in and out, it wasn't ready in time.
22 So I don't know if they moved it or didn't have

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1 it, but that location never...

2 Q. Were there other tables, dedicated tables,
3 to be there?

4 A. Not that I'm aware of.

5 Q. Okay. And who was in charge of, kind of,
6 setting up the building?

7 A. Well, obviously, there is --

8 Q. Coordinating it?

9 A. When you talk about voter registration,
10 there is a group who's supposed to be handling it.
11 Then there is permitting, that we get the proper
12 permits. And how many people -- especially
13 dealing with artists, how many people will be
14 inside the building. So it was a thought, and it
15 just never -- because of time, it just never
16 worked itself out. So it was -- just didn't have
17 it. I don't know if those groups threw aside,
18 hey, we don't need a building, just kind of walk
19 around.

20 Q. But they weren't able to get building
21 space to do it --

22 A. Right.

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1 Q. -- unfortunately?

2 A. Only because of time. There just wasn't
3 enough time to get that done.

4 MS. LANG: I'll mark Exhibit 4.

5 (Exhibit 4 was marked and
6 attached to the transcript.)

7 Q. This is a series of emails about the
8 budget process for this year's Virginia Beach
9 budget; is that right?

10 MR. BOYNTON: Take your time to review it
11 so you know what you're looking at.

12 A. All right.

13 Q. On DEF08179, that's just one example, at
14 bottom of the page --

15 A. I'm sorry?

16 Q. 179. At the bottom of the page it
17 indicates Rouse -- that's you -- had requested
18 additional parking at Seatack Park; is that right?

19 A. Yes.

20 Q. Had the budget been voted on yet or
21 finalized?

22 A. Yes.

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1 Q. And did it include additional parking at
2 Seatack?

3 A. No.

4 Q. And you also requested signage for the
5 Historic Seatack Community; is that right?

6 A. Yes.

7 Q. And was that included in the final budget?

8 A. No.

9 Q. And Ms. Wooten asked to add \$84,000 to the
10 Summer Youth Employment Program. Do you know if
11 that made it into the final budget?

12 A. I believe it was funded. I'm not sure how
13 much it was funded.

14 Q. She also asked to increase funding for a
15 staff member for the implementation of the
16 disparity study. Did that make it into the
17 budget?

18 A. Not that I recall.

19 Q. Okay. City Manager Hansen recently
20 resigned; is that right?

21 A. Yes.

22 Q. Okay. Prior to his resignation some

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1 members of the minority community were calling for
2 him to resign or be fired; is that right?

3 A. Yes.

4 Q. Did you support that position, that he
5 should either resign or be let go?

6 A. Yes, but not based off of the -- their
7 single perspective.

8 Q. Okay. And what were the reasons why you
9 felt that he should resign or be let go?

10 A. I think it was a culmination of things. I
11 thought it was because of his history that he had,
12 as well.

13 Q. What kind of history?

14 A. Well, saying things -- this is before my
15 tenure, but public statements that didn't show the
16 city in a -- in a -- in a respectable manner, so
17 to speak.

18 Q. Some of them were racially insensitive?

19 A. Some were very offensive.

20 Q. Yes.

21 A. Yes. Very offensive.

22 And so -- but that -- even still, for me,

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1 it came down to -- the tragedy on May 31st played
2 a big part in it. It's not that I -- I don't
3 think he -- I blame the shooter. I don't blame
4 Mr. Hansen for anything that has to do with that.

5 But I thought in order for us to go
6 forward as a city we needed a fresh start. We
7 didn't need the baggage of offensive remarks
8 laying around that would prevent us from
9 continuing taking a step forward. I felt it would
10 always be a point of contention with the city of
11 not really trusting that -- you know, our Council.
12 And we are working hard to earn and keep the trust
13 up to the public.

14 I think Mr. Hansen, he handled himself
15 well throughout the tragedy, I think throughout
16 Something in the Water. I mean, I have a lot of
17 respect for him. But as -- again, as I look at
18 the city going forward -- and, then, his latest
19 comment with -- we had the latest issue that came
20 up just prior to the tragedy. I thought it would
21 be incumbent upon us to go in a different
22 direction.

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1 Q. Has someone new been appointed to that
2 role yet?

3 A. We just got started with the process,
4 so -- we have an interim City Manager.

5 Q. And who is that?

6 A. It's Tom Leahy.

7 Q. And who made that decision? Was that a
8 City Council decision?

9 A. Yes.

10 Q. Who else was in the running for that
11 position of interim City Manager?

12 A. That's just it. I would say that's
13 private.

14 Q. You're invoking the privilege for that?

15 A. Yes.

16 Q. Okay. Are you familiar with the Virginia
17 Beach Interdenominational Ministers Conference,
18 like, five point plan on policing?

19 A. I'm -- I know they have a plan. I don't
20 know if it's five points on policing, but I know
21 they have interests that they are interested in.

22 Q. And have you -- are you aware of any

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1 action City Council has taken on that plan?

2 A. Not in particular, no.

3 Q. Okay. Do you agree that Virginia Beach,
4 like many places in the United States, has a
5 history of racial discrimination?

6 A. Yes.

7 Q. And many people in Virginia Beach minority
8 communities are still suffering the downstream
9 effects of that discrimination in poverty levels
10 or education outcomes or homeownership?

11 A. Yes.

12 MR. BOYNTON: I would interpose a general
13 objection. He can certainly testify to his own
14 understandings or beliefs. We're not offering him
15 as an expert in this.

16 MS. LANG: Of course not.

17 MR. BOYNTON: I don't want it to be
18 construed that way.

19 Thank you.

20 Q. Are you aware of concerns in the minority
21 community that black homeownership has decreased
22 in recent years?

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1 A. Yes.

2 Q. And do you share that concern?

3 A. Yes.

4 Q. And can you tell me a little bit more
5 about why you believe that homeownership in the
6 black community has decreased in recent years?

7 A. I think it's a culmination of a lot of
8 factors. I think that the disparity between the
9 income equality between, you know -- for black --
10 African Americans in general in the nation is
11 disproportionately huge, not in favor of African
12 Americans. So it's not so particularly Virginia
13 Beach; it's just -- it's our country.

14 And so I think it's important in our city
15 that African Americans can obtain homeownership
16 because, to me, it shows the health of your
17 community. If you have a diverse community, you
18 want everyone to be able to have access and be
19 able to have affordability here, as well.

20 Q. Uh-huh.

21 A. So --

22 Q. And you've noticed a decrease, actually,

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1 in homeownership in the black community in recent
2 years; is that right?

3 A. Yes. Across our nation, yes.

4 Q. Right. Uh-huh.

5 So would you agree that Virginia Beach
6 still has a long way to go to achieve racial
7 equity?

8 A. I say we have a lot. Yes, we have a lot
9 of work to do to receive not racial equity but
10 economic equity, as well, social equity. I mean,
11 yes, we have a lot of work to do, but that's not
12 to say we're not trying, though.

13 Q. No. Of course not.

14 A. Okay.

15 Q. I'm not saying that.

16 A. All right.

17 Q. And would you agree that increasing
18 representation on City Council and in other key
19 city roles would help move Virginia Beach toward
20 racial equity?

21 A. Absolutely.

22 MS. LANG: Can we take a quick break?

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1 MR. BOYNTON: Sure.

2 (A recess was taken.)

3 Q. Mr. Rouse, we'll go back on the record.

4 I really don't have many questions left
5 for you.

6 Do you know about how much money you were
7 able to raise during your campaign?

8 A. I think around \$90,000, I want to say.

9 Q. Uh-huh.

10 And what were your biggest expenses for
11 your campaign?

12 A. Media.

13 Q. Uh-huh.

14 A. The four-by-eights -- was it the
15 four-by-eights? The huge -- I think they're
16 four-by-eights, four-by-four, something, the huge
17 signs, were hard. The printing, and the media.
18 The TV ads were ridiculous. Gas. All the
19 literature you have to pass out, stickers. Yeah.

20 Q. Do you know how your fundraising fared as
21 compared to the typical City Council candidate?

22 A. Well, I only know about my competitive

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1 race, it's in the bucket. Like, I know we were
2 outspent by a couple candidates, like -- the top
3 three candidates. We were outspent heavily,
4 like -- they reached, like, six figures, so...

5 Q. I don't have any further questions for
6 you.

7 MS. LANG: Do you have any questions?

8 MR. BOYNTON: I don't.

9 You have the right to read and sign this
10 deposition transcript when it's transcribed to
11 provide any comments as to whether it was
12 transcribed accurately. We've been advising our
13 people to read and sign. So if you'd just tell
14 the lady.

15 He'll read.

16 THE DEPONENT: Yes. I'll read and sign
17 once we get it out.

18

19 (Signature having not been waived, the
20 deposition of AARON R. ROUSE was concluded at
21 11:50 a.m.)

22

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ACKNOWLEDGMENT OF DEPONENT

I, AARON R. ROUSE, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct, and complete transcription of the testimony given by me and any corrections appear on the attached Errata Sheet signed by me.

(DATE)

(SIGNATURE)

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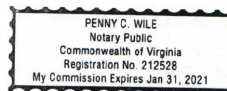
1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Penny C. Wile, RPR, RMR, CRR, the
3 officer before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record of the
6 testimony given; that said testimony was taken by
7 me stenographically and thereafter reduced to
8 typewriting under my direction; that reading and
9 signing was requested; and that I am neither
10 counsel for, related to, nor employed by any of
11 the parties to this case and have no interest,
12 financial or otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my notarial seal this 16th day of
15 September, 2019.

16 My commission expires: January 31, 2021.

17 



18
19
20 _____
21 NOTARY PUBLIC IN AND FOR
22 THE COMMONWEALTH OF VIRGINIA

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